J. ARE THE LECS' RELOCATION PROVISIONS REASONABLE?

## RESPONSE:

The NTCs are permitted to reclaim space and relocate an interconnector's multiplexing node and associated equipment in only four limited circumstances: (1) if required by the NTCs to fulfill their obligations under law; (2) upon a taking of the serving wire center premises by eminent domain; (3) if necessary to install additional facilities in a conduit system; or (4) in the event of an emergency. The limited relocation provisions contained in the NTCs' tariff are entirely reasonable.

The NTCs must retain the right to relocate an interconnector's facilities in order to serve their own customers or another expanded interconnector customer, or to protect their facilities in an emergency. The NTCs will provide the interconnector with advance notice of the required relocation in all cases, except in the event of an emergency, where they will use reasonable efforts to provide the interconnector with advance notice. Moreover, if relocation of the interconnector's multiplexing node is required, the NTCs

Section 28.1.4. In addition, with microwave expanded interconnection the NTCs reserve the right to rearrange an interconnector's facilities in the event the use of the NTCs' serving wire center roof is limited by any authority having jurisdiction or due to physical constraints.

will negotiate a relocation schedule with the interconnector to minimize any disruption of the interconnector's services. Finally, the NTCs will charge the interconnector for relocations only in the event of an emergency, and only in the event that the emergency is a result of the acts of the interconnector, its agents or contractors.<sup>2</sup>

K. ARE THE LECS' INSURANCE PROVISIONS REASONABLE?

## RESPONSE:

The insurance provisions contained in the NTCs' tariff are entirely reasonable. Since the interconnector will be working on the NTCs' premises, it is appropriate to require interconnectors to carry insurance to protect the NTCs against any loss they may suffer through the acts of the interconnector or its agents.

The NTCs require interconnectors to provide insurance in the amount of \$2 million per occurrence in comprehensive general liability and \$5 million in excess liability coverage. These insurance amounts, which are identical to the amounts required of interconnectors under the NTCs' state expanded interconnection tariffs, were determined after a review of the potential risks incurred by the NTCs in permitting interconnectors to work and place their equipment in the NTCs' offices. The levels of insurance required by the NTCs, which are among the lowest required by any of the LECs, are entirely reasonable in light of the costs which the NTCs would incur in the event a central office was damaged or destroyed due to the acts of an interconnector or its contractors. 1

For example, a 1987 fire in NYT's Bushwick Avenue central office affected over 40,000 customers and caused over \$50 million in damage.

The tariff also requires the use of underwriters with at least a AA-12 rating. This is the same rating required by NYNEX Corporation of its insurers.

The tariff does not contain a provision permitting interconnectors to self-insure, nor do the NTCs believe that such a provision is appropriate. While there are interconnectors whose financial condition would permit them to self-insure, there are others for whom such an option would not be appropriate. Furthermore, the decision as to whether to permit self-insurance would require the NTCs to make judgments as to the financial condition of the interconnector. process could easily result in disputes between the NTCs and interconnectors in cases where the NTCs determined that self-insurance was not appropriate. Moreover, the financial conditions of enterprises change over time. While a company may qualify for self-insurance at one point in time, subsequent events (of which the NTCs might or might not be aware) may change its financial condition so that it would no longer be prudent for the NTCs to permit the interconnector to self-insure. In sum, requiring a reasonable amount of insurance of all interconnectors provides the most effective way for the NTCs to protect themselves against the liability concerns arising from expanded interconnection. It is also the most equitable, since it would guarantee equal treatment of all interconnectors.

Finally, the NTCs require that an interconnector's insurance be effective prior to the occupancy date. This provision is clearly reasonable, since the reason for requiring insurance is to protect the NTCs from liabilities resulting from the presence of the interconnector on the NTCs' premises.

Section 28.7.2(d).

L. ARE THE LECS' LIABILITY PROVISIONS REASONABLE?

## RESPONSE:

The NTCs' tariff provides that the NTCs will not be liable to the interconnector for physical damage to its facilities or equipment caused by the negligence of the NTCs. The interconnector's right of action against the NTCs in the case of gross negligence or willful misconduct by the NTCs is not limited. The interconnector is required to indemnify the NTCs against all claims and liabilities arising out of the operation of its facilities in the NTCs' central office.

These liability provisions are entirely reasonable. First, the tariff provision requiring the interconnector to indemnify the NTCs for all damages arising out of the interconnector's operations is designed solely to keep the NTCs whole in the event of a loss caused by an interconnector. Moreover, it is not unreasonable for the NTCs to limit their own liability while holding interconnectors liable for more than the NTCs assume under the tariff. In an expanded interconnection arrangement, the NTCs' relationship with the interconnector is analogous to the relationship between a landlord and tenant. It is not unusual in landlord-tenant

<sup>1</sup> Section 28.7.4.

relationships to shift the majority of business and liability risks to the tenant.

M. ARE THE LECs' PROVISIONS REGARDING WHETHER TO BILL FROM THEIR STATE OR INTERSTATE EXPANDED INTERCONNECTION TARIFFS REASONABLE?

## RESPONSE:

The NTCs' tariff provides that nonrecurring and recurring charges for expanded interconnection will be apportioned based on the percent interstate use ("PIU") of all services provided by the NTCs to the interconnector's multiplexing node. The PIU must be supplied by the interconnector. 1

The NTCs do not believe that the 10 percent rule should apply to expanded interconnection rate elements. 2

Rather, the PIU is a more precise and equitable method of allocating the multi-jurisdictional costs and revenues for expanded interconnection service. While the Commission's Expanded Interconnection Order initially mandated only interstate special access expanded interconnection, the NTCs already have state special access interconnection arrangements

Section 2.3.10(c).

To separate the costs for special access services into state and interstate portions, LECs use the "ten percent rule". Pursuant to that rule, if more than ten percent of the traffic through a line is interstate traffic, the costs are assigned to the interstate jurisdiction and the LEC would charge its customer the interstate tariff rates for the entire line. See 47 C.F.R. § 36.154(a).

in place<sup>3</sup> and the NTCs' interstate tariff will soon permit switched interconnection arrangements in the multiplexing nodes in their central offices. Because the multiplexing node will be used for switched and special access services, both state and interstate, the PIU is a more precise and equitable method of allocating the multi-jurisdictional revenues for the service. <sup>4</sup>

NYT also has state switched access interconnection arrangements in place.

Furthermore, the 10% rule was developed because usage over special access facilities is not measurable. This is not the case with expanded interconnection. The interconnector will control the number of switched and special access services that terminate at its multiplexing node and is in the best position to identify the jurisdictional nature of those services.

N. ARE THE LECs' PROVISIONS REGARDING LETTERS OF AGENCY REASONABLE?

## **RESPONSE:**

The NTCs' tariff does not contain a provision regarding letters of agency allowing an interconnectors' customers to negotiate services on the interconnector's behalf. The NTCs, however, permit the use of letters of agency in connection with their other switched and special access services. Consistent with this long-standing policy, the NTCs will accept letters of agency for switched and special access services that terminate at an interconnector's multiplexing node, and will bill appropriate charges to third parties if an interconnector so requests.

O. ARE THE LECS' PROVISIONS REGARDING INSPECTIONS OF INTERCONNECTOR SPACE AND FACILITIES REASONABLE?

## **RESPONSE:**

In their tariff, the NTCs reserve the right to (1) inspect the completed installation of the interconnector's equipment and facilities; and (2) make subsequent inspections "for purposes of averting any threat or harm...[to NTC] equipment, facilities and/or personnel..." The purpose of the inspections is not to harass the interconnector, as some parties have suggested, but rather to ensure that the interconnector's initial installation complies with the requirements of the tariff, and to verify that the interconnector is conducting its operations on the NTCs' premises in a manner that will not result in harm to the NTCs' network or personnel. Moreover, the interconnector will not be charged for such inspections, except in the event that the inspection reveals that the customer is found to be in non-compliance with the terms and conditions of the tariff. 3

<sup>1</sup> Sections 28.7.9(a) and (b).

It should be noted that inspections of state expanded interconnection arrangements have been very infrequent.

<sup>3</sup> Section 28.7.9(b).

P. SHOULD LECS BE PERMITTED TO INCLUDE PROVISIONS REGARDING THE PAYMENT OF TAXES AND SIMILAR ASSESSMENTS BY INTERCONNECTORS?

## RESPONSE:

The NTCs do not believe that a tariff provision regarding the payment of taxes and similar assessments by interconnectors is necessary, and have not included such a provision in their expanded interconnection tariff.

## DS1 Cross-Connection Cable and Cable Support Function

	Rate Element Name #1	Rate Element Name #2	Rate Element Name #3	Rate Element Name
	OCT - CABLE PORTION			
TOTAL INVESTMENT: List Plant & Equip.	\$12.07		S	3
SUBSC AER CBL BLDG MET-2421-20 YRS			<del></del>	\$
List: Name - Pt. 32 Acct No Dep. Life				\$
List: Name - Pt. 32 Acct No Dep. Life			<del></del>	8
List: Name - Pt. 32 Acct No Dep. Life				\$
List: Name - Pt. 32 Acct No Dep. Life				<u> </u>
List: Name - Pt. 32 Acct No Dep. Life				<del></del>
List: Name - Pt. 32 Acct No Dep. Life	- <del></del>			Š
List: Name - Pt. 32 Acct No Dep. Life			<del></del>	<u> </u>
List: Name - Pt. 32 Acct No Dep. Life				\$
List: Name - Pt. 32 Acct No Dep. Life				\$
List: Name - Pt. 32 Acct No Dep. Life			\$	<u> </u>
List: Name - Pt. 32 Acct No Dep. Life				Š
List: Name - Pt. 32 Acct No Dep. Life	ž		3	<u>\$</u>
List: Name - Pt. 32 Acct No Dep. Life			\$	Š
List: Name - Pt. 32 Acct No Dep. Life			\$	Š
List: Name - Pt. 32 Acct No Dep. Life				\$
List: Name - Pt. 32 Acct No Dep. Life			\$	\$
List: Name - Pt. 32 Acct No Dep. Life		\$	\$	\$
List: Name - Pt. 32 Acct No Dep. Life		\$	1	\$
DEPRECIATION EXPENSE	\$1.27		\$	\$
COST OF MONEY (\$ Amount)	\$0.68	\$	\$	8
COST OF MONEY (Percentage)	1.70%	%	94	<del></del>
FEDERAL INCOME TAX	\$0.18	\$	\$	\$
STATE AND LOCAL INCOME TAX	\$0.01	Š	\$	\$
OTHER TAX: List Taxes	\$0.40	\$	3	\$
List: Property Tax	\$0.40			\$
List:				\$
List:	\$	3	\$	\$
List	\$	\$	\$	\$
List	\$	\$	\$	\$
List:	Š	\$	\$	\$
MAINTENANCE EXPENSE	\$1.02	\$	\$	Š
ADMIN and OTHER EXPENSE: List Expense	\$0.37	\$	\$	\$
CUSTOMER OPER. 6610/6620	\$0.33			\$
UNCOLLECT5300	\$0.02			\$
MISC OPER REV 5200	\$0.02			\$
				\$
List: Name - Pt. 32 Acct No.				<u> </u>
List: Name - Pt. 32 Acct No.			<u> </u>	\$
List: Name - Pt. 32 Acct No.	<u> </u>			\$
List: Name - Pt. 32 Acct No.				\$
List: Name - Pt. 32 Acct No.			· · · · · · · · · · · · · · · · · · ·	<u> </u>
List: Name - Pt. 32 Acct No.	<u> </u>		\$	<u> </u>
List: Name - Pt. 32 Acct No.				\$
List: Name - Pt. 32 Acct No.				\$
List: Name - Pt. 32 Acct No.			<del>3</del>	\$
List: Name - Pt. 32 Act No.			3	\$
List: Name - Pt. 32 Acct No.			<u> </u>	\$
List: Name - Pt. 32 Acct No.			<del></del>	\$
ANNUAL COST PER UNIT	\$3.93		<u> </u>	\$
MONTHLY COST PER UNIT	\$0.33		<u> </u>	\$
MONTHLY RATE PER UNIT	\$0.49		<u> </u>	<del>:</del>
UNIT OF MEASUREMENT	PER OCT			· · · · · · · · · · · · · · · · · · ·
1				
RATIO: Rate / Direct Cost	1.8588			

Notes:
(1) Cross ~ Connection Cable and Cable Support Function includes costs for all cabling and cable support structures between interconnector's space and LEC's MDF.
(2) Row 54: Unit of measurement is the unit on which the rate is being assessed, e.g., per ft., per DS1 arrangement, etc.

## DS3 Cross-Connection Cable and Cable Support Function

		Rate Element Name #1	Rate Element Name #2	Rate Element Name #3	Rate Element Name
		OCT - CABLE PORTION			
	TOTAL INVESTMENT: List Plant & Equip.	\$541.07			\$
_	SUBSC AER CBL BLDG MET-2421 - 20 YRS	541.07		<del>7 </del>	\$
3					\$
4	List: Name - Pt. 32 Acct No Dep. Life				\$
5	List: Name - Pt. 32 Acct No Dep. Life List: Name - Pt. 32 Acct No Dep. Life		<del></del>	<del></del>	\$
7	List: Name - Pt. 32 Acct No Dep. Life			3	<u> </u>
8	List: Name - Pt. 32 Acct No Dep. Life		<del></del>		<u> </u>
9			\$	\$	\$
10	List: Name - Pt. 32 Acct No Dep. Life	\$	\$	\$	\$
11	List: Name - Pt. 32 Acct No Dep. Life				\$
12	List: Name - Pt. 32 Acct No Dep. Life				<u>\$</u>
13					<u> </u>
14	List: Name - Pt. 32 Acct No Dep. Life List: Name - Pt. 32 Acct No Dep. Life		· · · · · · · · · · · · · · · · · · ·	<del></del>	\$
6					<del>.</del>
17	List Name - Pt. 32 Acct No Dep. Life		<del></del>		\$
8					\$
0		\$	\$	\$	\$
20	List: Name - Pt. 32 Acct No Dep. Life	\$	<del></del>	\$	\$
	DEPRECIATION EXPENSE	\$56.87			\$
	COST OF MONEY (\$ Amount)	\$30.64		\$	\$
	COST OF MONEY (Percentage)	1.70%	Ж.	%	
	FEDERAL INCOME TAX	\$8.14	<del></del>		\$
	STATE AND LOCAL INCOME TAX	\$0.39			\$
	OTHER TAX: List Taxes	\$18.07			\$
27 28	List Property Tex	\$18.07			\$
29	List		<del></del>		<u>.                                    </u>
30	List		<del></del>	<del></del>	<u> </u>
31	List		<del></del>		\$
32	List:			\$	\$
33	MAINTENANCE EXPENSE	\$45.76	\$	3	\$
34	ADMIN and OTHER EXPENSE: List Expense	\$16.46	\$	\$	\$
	CUSTOMER OPER. 8810/8620	\$14.02		3	\$
	UNCOLLECT5300	\$0.89		8	\$
	MISC OPER REV5200	\$0.95		\$	\$
38	List: Name - Pt. 32 Acct No.			\$	<u>\$</u>
39	List: Name - Pt. 32 Acct No.			\$	\$
40			<del></del>	<u>\$</u>	\$
41 42	List: Name - Pt. 32 Acct No. List: Name - Pt. 32 Acct No.			<u>\$</u>	\$
43	List: Name - Pt. 32 Acct No.	<del></del>		<u> </u>	\$
ũ	List Name - Pt. 32 Acct No.			<u> </u>	Š
15	List: Name - Pt. 32 Acct No.	· · · · · · · · · · · · · · · · · · ·		3	\$
48	List: Name - Pt. 32 Acct No.	3	\$	3	\$
17	List: Name - Pt. 32 Acct No.	<del></del>	· · · · · · · · · · · · · · · · · · ·	\$	\$
18	List: Name - Pt. 32 Acct No.	<del></del>		\$	\$
19		<u></u>			\$
0				\$	\$
	ANNUAL COST PER UNIT	\$176.33		\$	\$
	MONTHLY COST PER UNIT	\$14.69			\$
	MONTHLY RATE PER UNIT	22.03	•	\$	<u>\$</u>
34	UNIT OF MEASUREMENT	PER OCT	J		
58	RATIO: Rate / Direct Cost	1.8643	<del></del>		
•	RATIO: Rate / Unit Cost	1,4992			

Notes:
(1) Cross—Connection Cable and Cable Support Function includes costs for all cabling and cable support structures between interconnector's space and LEC's MDF.
(2) Row 54: Unit of measurement is the unit on which the rate is being assessed, e.g., per ft., per DS3 arrangement, etc.

## Termination Equipment Function

	Rate Element Name #1	Rate Element Name #2	Rate Element Name #3	Rate Element Name #
	DS1 OCT	DS3 OCT		
1 TOTAL INVESTMENT: List Plant & Equip. 2 TERMINATION EQUIP 2232:19-11 YRS	\$146.00 \$146.00	1433.82 1433.82		\$ \$
3 List Name - Pt. 32 Acot No Dep. Life			3	\$
4 List Name - Pt. 32 Acct No Dep. Life			<u> </u>	3
5 List Name - Pt. 32 Acct No Dep. Life				\$
	8	\$	8	\$
7 List: Name - Pt. 32 Acct No Dep. Life	3			\$
T TIOL 110112 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	18	<u> </u>		\$
	\$		\$	<u>\$</u>
10 List: Name - Pt. 32 Acct No Dep. Life 11 List: Name - Pt. 32 Acct No Dep. Life	\$		<u>\$</u>	<u>\$</u>
	3		<u> </u>	\$
	\$		<u> </u>	\$
14 List: Name - Pt. 32 Acct No Dep. Life			<del></del>	\$
15 List: Name - Pt. 32 Acct No Dep. Life	\$	\$	\$	\$
16 List: Name - Pt. 32 Acct No Dep. Life	8		<del></del>	\$
7 List: Name - Pt. 32 Acct No Dep. Life		<del></del>		\$
18 List: Name - Pt. 32 Acct No Dep. Life				\$
19 List: Name - Pt. 32 Acct No Dep. Life				\$
20 List Name - Pt. 32 Acct No Dep. Life 21 DEPRECIATION EXPENSE	\$15.35	\$150.71	<del></del>	3
22 COST OF MONEY (\$ Amount)	\$15.35	\$81.21	<u> </u>	<u> </u>
23 COST OF MONEY (Percentage)	1.70%	1.70%		•
PA FEDERAL INCOME TAX	\$2.20	\$21.57	•	2
STATE AND LOCAL INCOME TAX	\$0.10	\$1.03		<u> </u>
26 OTHER TAX: List Taxes	\$4.88	347.88	<del></del>	\$
27 List: Property Tax	\$4.88			\$
28 List:	8	\$	\$	\$
29 List:	3	3	\$	\$
30 List:	\$	\$	\$	\$
31 List:	\$	\$		\$
32 List	8			3
33 MAINTENANCE EXPENSE	\$12.35	\$121.26		\$
34 ADMIN and OTHER EXPENSE: List Expense 36 CUSTOMER OPER, 6610/6620	\$4.44 \$3.94	\$43.61 \$38.73		\$ \$
36 UNCOLLECT 5300	\$0.24			\$
37 MISC OPER REV 5200	\$0.26			\$
38 List: Name - Pt. 32 Acct No.	\$			\$
39 List: Name - Pt. 32 Acct No.	\$		8	\$
40 List: Name - Pt. 32 Acct No.	\$	\$	\$	\$
41 List: Name - Pt. 32 Acct No.	\$	1 <del> </del>	\$	\$
42 List: Name - Pt. 32 Acct No.	\$		\$	\$
43 List: Name - Pt. 32 Acct No.	8		\$	\$
44 List: Name - Pt. 32 Acct No.	\$		\$	\$
45 List: Name - Pt. 32 Acct No.	3	<del></del>	\$	\$
16 List: Name - Pt. 32 Acct No.	\$		\$	\$
47 List: Name Pt. 32 Acct No. 48 List: Name Pt. 32 Acct No.	\$		\$ \$	\$ \$
19 List Name - Pt. 32 Acct No.	\$		\$	<u> </u>
50 List; Name - Pt. 32 Acct No.	8		<del>*</del>	\$
31 ANNUAL COST PER UNIT	\$47.58	\$467.27		\$
52 MONTHLY COST PER UNIT	\$3.97	\$38.94		\$
SO MONTHLY RATE PER UNIT	5.94	58.33		\$
SA UNIT OF MEASUREMENT	1		·	
	PER OCT	PER OCT		
55 RATIO: Rate / Direct Cost	1.8628	1.8627		
56 RATIO: Rate / Unit Cost	1,4981	1,4980		

Notes:

(1) The Termination Equipment Function includes all equipment in or adjacent to the interconnector's space that is used for cross—connection functions, except the cross—connection itself, e.g., POT frames, DSX boards, as well as equipment bays and other equipment installed by the LEC in the interconnector's space.

(2) Row 54: Unit of measurement is the unit on which the rate is being assessed, e.g., per POT frame, per 100 square foot arrangement.

## DC Power Generation Function

	Rate Element Name #1	Rate Element Name #2	Rate Element Name #3	Rate Element Name
1 TOTAL INVESTMENT: List Plant & Equip.	DC POWER \$200.35	•	<u> </u>	
2 POWER PLANT - 2232 - 11 YRS.	\$200.35			<u>\$</u>
List: Name - Pt. 32 Acct No Dep. Life			\$	
4 List Name - Pt. 32 Acct No Dep. Life		<del></del>	3	\$ \$
5 List: Name - Pt. 32 Acct No Dep. Life				<u> </u>
6 List: Name - Pt. 32 Acct No Dep. Life				<del>i</del>
7 List: Name - Pt. 32 Acct No Dep. Life				<del>``</del>
8 List: Name - Pt. 32 Acct No Dep. Life		\$	<del></del>	<u> </u>
9 List: Name - Pt. 32 Acct No Dep. Life		\$		\$
List: Name - Pt. 32 Acct No Dep. Life	\$	\$	\$	\$
List: Name - Pt. 32 Acct No Dep. Life	3	\$	\$	\$
List: Name - Pt. 32 Acct No Dep. Life		<u> </u>	<del></del>	\$
List: Name - Pt. 32 Acct No Dep. Life	\$	<del>`</del>		\$
List: Name - Pt. 32 Acct No Dep. Life		·		\$
List: Name - Pt. 32 Acct No Dep. Life		<u> </u>		\$
List Name - Pt. 32 Acct No Dep. Life				\$
7 List Name - Pt. 32 Acct No Dep. Life List Name - Pt. 32 Acct No Dep. Life		\$		\$
		<del></del>		\$
List: Name - Pt. 32 Acct No Dep. Life				\$
List: Name - Pt. 32 Acct No Dep. Life DEPRECIATION EXPENSE	\$21.08			\$ \$
COST OF MONEY (\$ Amount)	\$21.00		\$	<u> </u>
COST OF MONEY (Percentage)	1.70%			
FEDERAL INCOME TAX	\$3.01			\$
STATE AND LOCAL INCOME TAX	\$0.14		·	\$
OTHER TAX: List Taxes	\$6.69			<u> </u>
7 List Property Tax	\$6.69		· · · · · · · · · · · · · · · · · · ·	<u> </u>
List			<del></del>	\$
Liet	\$			<u> </u>
Ust:	\$		<del></del>	\$
Lisk	\$			\$
2 List:	\$	\$	\$	\$
MAINTENANCE EXPENSE	\$16.94	\$	\$	\$
ADMIN and OTHER EXPENSE: List Expense			\$	\$
CUSTOMER OPER. 6610/6620	\$5.41	\$	\$	\$
UNCOLLECT 5300	\$0.33	\$	\$	\$
MISC OPER REV 5200	\$0.35	3	\$	\$
List: Name - Pt. 32 Acct No.	\$	\$	\$	\$
List: Name - Pt. 32 Acct No.	\$	\$	\$	\$
List: Name - Pt. 32 Acct No.	\$	<u> </u>	\$	\$
List: Name - Pt. 32 Acct No.	8	\$	\$	\$
List: Name - Pt. 32 Acct No.	8	3	\$	\$
List: Name - Pt. 32 Acct No.	8	\$	\$	\$
List: Name - Pt. 32 Acct No.	\$	3		\$
List: Name - Pt. 32 Acot No.	\$	\$	\$	<u> </u>
List: Name - Pt. 32 Acct No. List: Name - Pt. 32 Acct No.	\$ \$	\$ \$	\$ \$	\$
List Name - Pt. 32 Acct No.	\$ \$	\$	3	\$
List: Name - Pt. 32 Acct No.				\$
List: Name - Pt. 32 Acct No.	\$			<u> </u>
ANNUAL COST PER UNIT	\$65.29	<u> </u>	<u>:</u>	<u> </u>
MONTHLY COST PER UNIT	\$5.44		\$	\$
MONTHLY RATE PER UNIT	8.15		<u>;                                    </u>	\$
UNIT OF MEASUREMENT	8.13	_	-	<del></del>
TOTAL MINISTERNATION OF THE PROPERTY OF THE PR	PER AMP	ļ	j	
RATIO: Rate / Direct Cost	1,8626			
RATIO: Rate / Unit Cost	1.4979	<del></del>		

- Notes:
  (1) The DC Power Generation Function includes the costs of providing DC power, excluding DC power installation costs.
  (2) Row 54: Unit of measurement is the unit on which the rate is being assessed, e.g., per fuse amp, per 100 square foot tenancy, etc.

# Floor Space Function

•	Rate Element Name #1	ł .	Rate Element Name #3	1
	FLOOR SPACE	FLOOR SPACE	FLOOR SPACE	FLOOR SPACE
	NET BAND	NYT BAND 1	NYT BAND 2	NYT BAND 3
TOTAL INVESTMENT: List Plant & Equip.	\$83.79		\$87.07	\$112
LAND - 2111 - NONE	\$3.88		\$2.94	\$3
BUILDINGS - 2121 - 49 YRS List: Name - Pt. 32 Acct No Dep. Life	\$79.91		\$84.73 \$	\$109
	3	\$	<u> </u>	\$
List: Name - Pt. 32 Acct No Dep. Life	I <del>V </del>	š	<u> </u>	3
List: Name - Pt. 32 Acct No Dep. Life			Š	s
	\$	\$	\$	\$
List: Name - Pt. 32 Acct No Dep. Life	3	\$	\$	\$
List: Name - Pt. 32 Acct No Dep. Life		\$	8	\$
	3	8	8	\$
List: Name - Pt. 32 Acct No Dep. Life	3	\$	\$	3
List: Name - Pt. 32 Acot No Dep. Life List: Name - Pt. 32 Acot No Dep. Life	8	\$	<u>\$</u>	\$
	8	\$	<del>:</del> -	3
	<u> </u>	\$	<u> </u>	\$
	<u> </u>	\$	\$	\$
List: Name - Pt. 32 Acot No Dep. Life		\$	8	\$
List: Name - Pt. 32 Acct No Dep. Life	\$	\$	\$	\$
List: Name - Pt. 32 Acct No Dep. Life		\$	\$	\$
depreciation expense	\$8.81	36.53	\$9.22	\$11
COST OF MONEY (\$ Amount)	\$4.75	\$3.52	\$4.97	\$
COST OF MONEY (Percentage)	1.70%	1.70%	1.70%	1,3
FEDERAL INCOME TAX	\$1,26	\$0.93	\$1.32	
STATE AND LOCAL INCOME TAX	\$0.06	\$0.04	\$0.06	30
OTHER TAX: List Taxes	\$2.80	\$2.07 \$2.07	\$2.93	\$
List: Property Tax List:	\$2.80		*\$2.93	\$
List	\$	\$	<u> </u>	3
List:	\$	3	3	\$
List:	3	\$	8	\$
List:	\$	\$	\$	\$
MAINTENANCE EXPENSE	\$7.09	\$5.25	\$7.41	\$
ADMIN and OTHER EXPENSE: List Expense			\$2,67	\$
CUSTOMER OPER. 6610/6620	\$2.26	\$1.60	\$2.37	3
UNCOLLECT5300	\$0.14		\$0.14	9
MISC OPER REV 5200 List: Name - Pt. 32 Acct No.	\$0.15	\$0.11	\$0,15	<del></del>
List: Name - Pt. 32 Acct No.	\$	\$	\$	\$
List: Name - Pt. 32 Acct No.	\$	3	<u> </u>	3
List: Name - Pt. 32 Acot No.	3	3	Š	\$
List: Name - Pt. 32 Acct No.	\$	3	\$	3
List: Name - Pt. 32 Acct No.	\$	\$	\$	8
List: Name ~ Pt. 32 Acct No.	\$	3	\$	\$
List: Name - Pt. 32 Acct No.		\$	\$	\$
List: Name - Pt. 32 Acct No.	\$		8	3
List: Name - Pt. 32 Acct No.	3	\$	\$	3
List: Name - Pt. 32 Acct No.	\$	\$	\$	\$
List: Name - Pt. 32 Acct No. List: Name - Pt. 32 Acct No.	8	\$	\$	\$
ANNUAL COST PER UNIT	\$27.31	\$20.25	\$28.57	3 99
MONTHLY COST PER UNIT	\$2.28	\$1.09	\$2.38	\$3
MONTHLY RATE PER UNIT	\$2.97		\$3.11	\$
UNIT OF MEASUREMENT	30.5			<del></del>
	PER SQ FT	PER SQ FT	PER SQ FT	PER SQ FT
RATIO: Rate / Direct Cost	1.6230	1.5213	1.6243	1.6
RATIO: Rate / Unit Cost	1,3052	1,3039	1.3062	1,3

The Floor Space Function includes costs for occupancy of central office floor space by the interconnector, including ancillary and housekeeping functions.
 All costs not directly associated with occupancy, e.g., DC power equipment and termination equipment, must be excluded.
 Row 54: Unit of measurement is the unit on which the rate is being assessed, e.g., per collocation request, per 100 square foot tenancy, per additional 100 square foot tenancy, etc.

## Floor Space Function

## Recurring Rate page 2

2 1		FLOOR SPACE NYT BAND 4			Rate Element Name #4
3 4	TOTAL INVESTMENT: List Plant & Equip.	\$150.82			\$
5	AND - 2111 - NONE	\$6.24			8
	BUILDINGS - 2121 - 49 YRS	\$144.58			8
	List: Name - Pt. 32 Acct No Dep. Life	3			8
61	List: Name - Pt. 32 Acct No Dep. Life	\$			\$
	List: Name - Pt. 32 Acct No Dep. Life				\$
7	List: Name - Pt. 32 Acct No Dep. Life			<del></del>	\$
8	List: Name - Pt. 32 Acct No Dep. Life				\$
9	List: Name - Pt. 32 Acct No Cep. Life				\$
10	List: Name - Pt. 32 Acct No Dep. Life				\$
11	List: Name - Pt. 32 Acct No Dep. Life				\$
12	List: Name - Pt. 32 Acot No Dep. Life		<u> </u>		\$
13	List: Name - Pt. 32 Acct No Dep. Life				\$
14	List: Name - Pt. 32 Acct No Dep. Life			•	\$
15	List: Name - Pt. 32 Acct No Dep. Life				\$
16	List: Name - Pt. 32 Acct No Dep. Life				\$
17	List: Name - Pt. 32 Acct No Dep. Life				\$
18	List Name - Pt. 32 Acct No Dep. Life				\$
19	List: Name - Pt. 32 Acct No Dep. Life	5		·	\$
20	List: Name - Pt. 32 Acct No Dep. Life	5			\$
	DEPRECIATION EXPENSE	\$15.85			\$
	COST OF MONEY (\$ Amount)	\$8.54		\$	\$
	COST OF MONEY (Percentage)	1.70%			
	FEDERAL INCOME TAX	\$2.27			\$
	STATE AND LOCAL INCOME TAX	\$0.11			\$
	OTHER TAX: List Taxes	85.04		<u> </u>	\$
	List: Property Tax	\$5.04			\$
28	List:				\$ \$
30	List:		<del></del>	<u> </u>	
31	List:		· · · · · · · · · · · · · · · · · · ·	<del>:</del> -	<u> </u>
32	List		<del></del>	•	<u>*                                    </u>
	MAINTENANCE EXPENSE	\$12.75	<del></del>	<u> </u>	<u> </u>
	ADMIN and OTHER EXPENSE: List Expense				\$
	CUSTOMER OPER, 6610/6620	\$4.07			\$
	JNCOLLECT5300	\$0.25			<u>;                                    </u>
	MISC OPER REV5200	\$0.27	<del>.*</del>		<u>*</u>
38	List Name - Pt 32 Acct No.				<u>;                                    </u>
39	List: Name - Pt. 32 Acet No.			<del></del>	<u> </u>
40	List: Name - Pt. 32 Acct No.			<del></del>	<u>\$</u>
41	List: Name - Pt. 32 Acct No.	<u> </u>		<u> </u>	<u> </u>
42	List Name - Pt. 32 Acct No.	LT			\$
43	List: Name - Pt. 32 Acct No.			<del></del>	<u> </u>
44	List Name - Pt. 32 Acct No.				<u> </u>
45	List Name - Pt. 32 Acct No.	<u> </u>	<del></del>	<del></del>	<u> </u>
46	List: Name - Pt. 32 Acct No.	L		3	\$ \$
	List: Name - Pt. 32 Acct No.				
		<u>.~</u>		<del></del>	\$
48	List: Name - Pt. 32 Acct No.			<u>\$</u>	\$
49	List: Name - Pt. 32 Acct No.			\$	\$
50	List: Name - Pt. 32 Acct No.			<u> </u>	\$
	ANNUAL COST PER UNIT	\$49.15		\$	<u>\$</u>
	MONTHLY COST PER UNIT	\$4.10		\$	\$
	MONTHLY RATE PER UNIT	\$5.33	3	\$	\$
L	UNIT OF MEASUREMENT	PER SQ FT			
	RATIO: Monthly Rate Per Unit / Direct Cost	1.6181			
	RATIO: Monthly Rate Per Unit / Unit Cost	1.3013			

Notes:

(1) The Floor Space Function includes costs for occupancy of central office floor space by the interconnector, including ancillary and housekeeping functions.

All costs not directly associated with occupancy, e.g., DC power equipment and termination equipment, must be excluded.

(2) Row 54: Unit of measurement is the unit on which the rate is being assessed, e.g., per collocation request, per 100 square foot tenancy, per additional 100 square foot tenancy, etc.

# **Entrance Facility Space Function**

	Rate Element Name #1	Rate Element Name #2	Rate Element Name #3	Rate Element Name #4
	CABLE VAULT SPACE	SPACE/LINEAR FT		
1 TOTAL INVESTMENT: List Plant & Equip.	\$1,451,20	\$6.70	2	\$
2 BUILDING-2121-49 YRS	\$1,451.20		\$	\$
	\$	36.70	\$	\$
4 List: Name - Pt. 32 Acct No Dep. Life	\$	\$	\$	\$
5 List: Name - Pt. 32 Acct No Dep. Life		\$	\$	\$
6 List: Name - Pt. 32 Acot No Dep. Life	\$	\$	3	8
7 List: Name - Pt. 32 Acct No Dep. Life		\$	\$	\$
8 List: Name - Pt. 32 Acct No Dep. Life	\$	\$	\$	\$
9 List: Name - Pt. 32 Acct No Dep. Life	3	\$	\$	\$
10 List: Name - Pt. 32 Acct No Dep. Life		\$	\$	\$
11 List: Name - Pt. 32 Acct No Dep. Life	\$	\$	\$	\$
12 List Name - Pt. 32 Acct No Dep. Life		\$	\$	\$
13 List: Name - Pt. 32 Acct No Dep. Life			\$	\$
14 List: Name - Pt. 32 Acct No Dep. Life		<del></del>	\$	\$
15 List: Name - Pt. 32 Acct No Dep. Life		<del>-</del>	3	\$
16 List: Name - Pt. 32 Acot No Dep. Life		<u> </u>	8	8
17 List: Name - Pt. 32 Acct No Dep. Life			\$	\$
18 List: Name - Pt. 32 Acot No Dep. Life			<u>\$</u>	8
19 List: Name - Pt. 32 Acct No Dep. Life			\$	8
20 List: Name - Pt. 32 Acat No Dep. Life			\$	3
21 DEPRECIATION EXPENSE	\$152.54	\$0.70		8
22 COST OF MONEY (\$ Amount)	\$82.19	\$0.38	\$	\$
23 COST OF MONEY (Percentage)	1.70%	1.70%		
24 FEDERAL INCOME TAX	\$21.83	\$0.10		\$
25 STATE AND LOCAL INCOME TAX	\$1.04	\$0.00		\$
26 OTHER TAX: List Taxes	\$48.46	\$0.22		3
27 List: Property Tex 28 List:	, 348.46 S	\$0.22	<u> </u>	\$ \$
	\$		<del></del>	3
	\$	<u> </u>	<u> </u>	<u> </u>
	<del></del>		<u> </u>	\$
			1	\$
33 MAINTENANCE EXPENSE	\$122.73	\$0.57	\$ .	š
34 ADMIN and OTHER EXPENSE: List Expense	\$44.14	\$0.20	\$	\$
35 CUSTOMER OPER. 6610/6620	\$39.20	\$0.18	\$	8
38 UNCOLLECT 5300	\$2.38	\$0.01	\$	\$
37 MISC OPER REV 5200	\$2.56	\$0.01	\$	\$
	<del></del>	<del></del>	\$	\$
39 List: Name - Pt. 32 Acct No.	\$	\$	\$	\$
	\$	\$	\$	\$
41 List: Name - Pt. 32 Acct No.	\$	3	\$	\$
	\$	\$	8	\$
	8	\$	\$	\$
44 List: Name - Pt. 32 Acct No.	\$	\$	\$	\$
			\$	\$
	\$	\$	\$	\$
	3	\$	\$	\$
	<del></del>		8	\$
			\$	\$
	3		\$	\$
51 ANNUAL COST PER UNIT	\$472.93	\$2.18		8
52 MONTHLY COST PER UNIT	\$39.41	\$0.18		\$
53 MONTHLY RATE PER UNIT	\$51,36	\$0.27	8	8
54 UNIT OF MEASUREMENT	PER CABLE	PER LINEAR FOOT		
55 RATIO: Rate / Direct Cost	1.5205	1.8452	<del></del>	
56 RATIO: Rate / Unit Cost	1.3032	1.4839		

Notes:
(1) The Entrance Facility Space Function includes the costs of conduit, vault, riser and similar space used to support an interconnection errangement from the manhole to the interconnectors's space.
(2) Row 54: Unit of measurement is the unit on which the rate is being assessed, e.g., cable space per foot, entrance conduit per interduct foot, etc.

WS-1.1

BUILDING SPACE RECURRING COST PER SOUARE FOOT

NEW ENGLAND TELEPHONE

NET LOCATION	ANNUAL INV PER SO. FT.	ANNUAL CCF	ANNUAL COST PER SO. FT.	MONTHLY COST
CALAIS	42.29	0.425355	17.99	\$1.50
WESTFIELD	48.89	0.425355	20.80	1.73
ANDOVER	49.68	0.425355	21.13	1.76
ROXBURY	52.15	0.425355	22.18	1.85
BEDFORD	52.70	0.425355	22.42	1.87
LEXINGTON	55.61	0.425355	23.65	1.97
WELLESLEY	56.20	0.425355	23.90	1.99
GREENFIELD	56.31	0.425355	<b>23.95</b> .	2.00
PALMER	56.40	0.425355	23.99	2.00
PROVIDENCE				
BROAD STREET	56.79	0.424355	24.16	2.01
HOLYOKE	57.49	0.425355	24.45	2.04
PEABODY	58.07	0.425355	24.07	2.06
AMHERST				
SOUTH PROSPECT	58.23	0.425355	24.77	2.06
ROCKLAND	59.42	0.425355	25.27	2.11
CONCORD	60.15	0.425355	25.59	2.13
DEDHAM	60.3	0.425355	25.65	2.14
BURLINGTON	60.53	0.425355	25.75	2.15
BRAINTREE	61.33	0.425355	26.09	2.17

NET LOCATION	ANNUAL INV PER SO. FT.	ANNUAL CCF	ANNUAL COST PER SO. FT.	MONTHLY COST
HARHICK	61.42	0.425355	26.13	\$2.18
WORCESTER	61.61	0.425355	26.21	2.18
HINGHAM	61.94	0.425355	26.35	2.20
WINCHESTER	62.43	0.425355	26.55	2.21
LONGMEADON	63.22	0.425355	26.89	2.24
NARRANGENSETT	63.38	0.425355	26.96	2.25
CANTON	63.74	0.425355	27.11	2.26
AMHERST FEARING	63.77	0.425355	27.12	2.26
LACONIA	65.00	0.425355	27.65	2.30
AGAWAM	65.97	0.425355	28.06	2.34
EAST BOSTON	66.04	0.425355	28.09	2.34
KEENE	66.06	0.425355	28.10	2.34
WEST HARWICK	67.36	0.425355	28.65	2.39
MALDEN	67.88	0.425355	28.87	2.41
NEHPORT	68.76	0.425355	29.25	2.44
CAMBRIDGE WARE ST.	69.97	0.425355	29.76	2.48
DOVER	71.69	0.425355	30.49	2.54
MONTPELIER	73.11	0.425355	31.10	2.59
MARLBORO	74.18	0.425355	31.55	2.63
HILMINGTON	74.47	0.425355	31.68	2.64
PORTSMOUTH	74.93	0.425355	31.87	2.66
LYNN	75.06	0.425355	31.93	2.66

NET LOCATION	ANNUAL INV PER SO. FT.	ANNUAL CCF	ANNUAL COST PER SO. FT.	MONTHLY COST
ST. JOHNSBURY	75.93	0.425355	32.30	\$2.69
WAKEFIELD	76.93	0.425355	32.72	2.73
LOMELL	77.75	0.425355	33.07	2.76
LEWISTON	78.55	0.425355	33.41	2.78
SPRINGFIELD	79.78	0.425355	33.93	2.83
EAST PROVIDENCE	80.01	0.425355	34.03	2.84
BURLINGTON	80.07	0.425355	34.06	2.84
ATTLEBORO	80.36	0.425355	34.18	2.85
SOMMERVILLE	80.49	0.425355	34.24	2.85
BROOKLINE	80.78	0.425355	34.36	2.86
NEWTON	80.98	0.425355	34.45	2.87
WILBRAHAM	81.00	0.425355	34.45	2.87
RUTLAND	81.09	0.424355	34.49	2.87
AUGUSTA	81.32	0.425355	34.59	2.88
PAWTUCKET	81.40	0.425355	34.62	2.89
BROCKTON	81.62	0.425355	34.72	2.89
WHITE RIVER JCT.	83.19	0.425355	35.39	2.95
FALL RIVER	83.65	0.425355	35.58	2.97
LEBANON	84.01	0.425355	35.73	2.98
HORCESTER CHESTNUT S	ST. 84.82	0.425355	36.08	3.01
PROVIDENCE MASHINGTO	W 84.91	0.425355	36.12	3.01
PORTLAND	86.79	0.425355	36.92	3.08
WALTHAM SPRING ST.	86.87	0.425355	36.95	3.08

NET LOCATION	ANNUAL INV PER SO. FT.	ANNUAL CCF	ANNUAL COST PER SO. FT.	MONTHLY COST
MANSFIELD	87.22	0.425355	37.10	\$3.09
NATICK	87.52	0.425355	37.23	3.10
EASTON	87.58	0.425355	37.25	3.10
ROCHESTER	88.12	0.425355	37.48	3.12
BRATTLEBORO	91.12	0.425355	38.76	3.23
BANGOR	92.64	0.425355	39.40	3.28
WESTBORO	93.24	0.425355	39.66	3.31
DORCHESTER	94.94	0.425355	40.38	3.37
LITTLETON	95.36	0.425355	40.56	3.38
QUINCY	95.69	0.425355	40.70	3.39
LUDLON	97.08	0.425355	41.29	3.44
BOSTON HARRISON AVE.	102.49	0.425355	43.59	3.63
HALTHAM HEST ST.	102.54	0.425355	43.62	3.63
FRAMINGHAM	104.17	0.425355	44.31	3.69
MAYNARD	106.08	0.425355	45.12	3.76
HANOVER	106.97	0.425355	45.50	3.79
PROVIDENCE GREEN ST.	108.06	0.425355	45.96	3.83
BENNINGTON	108.16	0.425355	46.01	3.83
NORTHAMPTON	108.40	0.425355	46.11	3.84
LAHRENCE	109.24	0.425355	46.47	3.87
BOSTON BELVIDERE ST.	109.51	0.425355	46.58	3.88
DERRY	118.50	0.425355	50.40	4.20

WS-1.5

NET LOCATION	ANNUAL INV PER SO. FT.	ANNUAL CCF	ANNUAL COST PER SO. FT.	MONTHLY COST
NASHUA	121.88	0.425355	51.84	\$4.32
BILLERICA	124.01	0.425355	52.75	4.40
BOSTON BOWDION SQ.	126.06	0.425355	53.62	4.47
CAMBRIDGE BENT ST.	141.18	0.425355	60.05	5.00
BOSTON FRANKLIN ST.	143.32	0.425355	60.96	5.08
SALEM	146.31	0.425355	62.23	5.19
MANCHESTER	148.86	0.425355	63.32	5.28
EAST LONGMEADON	150.59	0.425355	64.05	5.34
ESSEX JUNCTION	221.25	0.425355	94.11	7.84
	AVERAGE CO	OST NET SHC	LOCATIONS	\$ <u>2.97</u>

WS-1.6

BUILDING SPACE RECURRING COST PER SOUARE FOOT

NEW YORK TELEPHONE

NYT LOCATION	ANNUAL INV PER SO. FT.	ANNUAL CCF	ANNUAL COST PER SO. FT.	MONTHLY COST
ROCKAHAY	52.48	0.425355	22.32	\$1.86
ELMIRA	52.52	0.425355	22.34	1.86
HERTEL/BUFFALO	54.75	0.425355	23.29	1.94
JEROME/167 ST.	55.12	0.425355	23.45	1.95
SPAKENKILL/POUGHKEEPSIE 57.32		0.425355	24.38	2.03
GRAND CONCOURSE	61.10	0.425355	25.99	2.17
LONG ISLAND CITY	61.14	0.425355	26.01	2.17
ALBANY/WASHINGTON	61.60	0.425355	<b>26.20</b> .	2.18
YONKERS	63.43	0.425355	26.98	2.25
SOUTH PARK/BUFF	63.86	0.425355	27.16	2.26
ALBEMARLE	66.00	0.425355	28.07	2.34
ELMHOOD/BUFFALO	66.26	0.425355	28.18	2.35
PORTCHESTER	66.71	0.425355	28.38	2.36
UTICA	68.00	0.425355	28.92	2.41
GARDEN CITY	68.44	0.425355	29.11	2.43
UTICA/ILION	68.48	0.425355	29.13	2.43
TROY AVE	68.92	0.425355	29.32	2.44
	AVERAGE C	OST NYT SHC	LOCATIONS - BAND	1 \$2.20
DEER PARK	72.07	0.425355	30.66	2.55
BATAVIA	72.54	0.425355	30.86	2.57
LAKE KATRINE/KINGSTO	N 72.83	0.425355	30.98	2.58
SYRACUSE/JAMES ST.	74.01	0.425355	31.48	2.62